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Proposed Pro Hac Vice Admission as Counsel to The Chen Liu and Shu Fen Lie Revocable Trust

## UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

In re:	Chapter 11
BED BATH & BEYOND INC., et al.,	Case No. 23-13359 (VFP)
Debtors.	(Joint Administration Requested)

## NOTICE OF APPEARANCE AND DEMAND FOR NOTICES AND SERVICE OF PAPERS

PLEASE TAKE NOTICE that the below attorney enters his appearance, pursuant to Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") on behalf of The Chen Liu and Shu Fen Lie Revocable Trust. The attorney below requests, pursuant to Bankruptcy

Rules 2002 and 9007, and section 342 of the United States Bankruptcy Code, that copies of all notices and pleadings given or filed in this case be given and served upon him at the following:

William R. Firth, III, Esquire Evan W. Rassman, Esquire (pro hac vice pending) Cohen Seglias Pallas Greenhall & Furman, P.C.

500 Delaware Avenue Suite 730 Wilmington, DE 19801 Phone: 302-425-5089 Facsimile: (302) 425-5097

wfirth@cohenseglias.com erassman@cohenseglias.com

PLEASE TAKE FURTHER NOTICE that the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules specified above but also includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading, or request, whether formal or information, written or oral, and whether transmitted or conveyed by mail, delivered, electronically, telephone, telegraphs, telex, or otherwise filed or made with regard to the referenced case and proceedings therein.

PLEASE TAKE FURTHER NOTICE that neither this notice of appearance nor any subsequent appearance, pleading, claim or suit is intended or shall be deemed to waive The Chen Liu and Shu Fen Lie Revocable Trust's (i) right to have final orders in non-core matters entered only after *de novo* review by a higher court; (ii) right to trial by jury in any proceeding so triable; (iii) right to have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claims actions, defenses, setoff, or recoupments to which The Chen Liu and Shu Fen Lie Revocable Trust is or may be entitled under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: May 3, 2023

## COHEN, SEGLIAS, PALLAS, GREENHALL & FURMAN, P.C.

/s/ William R. Firth, III

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